

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 2:01cr
	)	
RODNEY HANK WILLIAMS,	)	18 U.S.C. § 1343
(Counts 1 - 15)	)	Wire Fraud
	)	(Counts 1 - 12)
a/k/a Simon Andrew Conrad	)	
	)	18 U.S.C. §§ 1028(a)(7) & 2
a/k/a Siothan Andrew Connor,	)	Identity Theft
	)	(Counts 13 - 14)
a/k/a Rod Williams,	)	
	)	42 U.S.C. § 408(a)(7)(B)
a/k/a Kenneth Gary Williams,	)	False Use of Social Security
	)	Number
and	)	(Count 15)
	)	
ELIZABETH HOUSE JANES,	)	
(Counts 1 - 15)	)	
Defendants.	)	

**SUPERSEDING INDICTMENT**

March 2002 Term - at Norfolk, Virginia

**COUNT ONE**

THE GRAND JURY CHARGES THAT:

**Introduction**

\_\_\_\_1. State Farm Mutual Automobile Insurance Company (hereinafter "State Farm") paid out approximately \$56,990.75 in personal injury and property damage claims against the automobile policy of its insured, Simon Andrew Conrad, social security number (hereinafter "SSN") 249-87-7087, relating to an automobile accident that allegedly occurred on or about September 27, 1997, at or near Edgefield, South Carolina.

2. GEICO General Insurance Company (hereinafter "GEICO") paid out approximately \$104,242.41 in personal injury and property damage claims against the automobile policy of its insured, Siiothan Andrew Connor, SSN 249-87-7155, relating to an automobile accident that allegedly occurred on or about February 7, 1998, in or near York County, South Carolina. The Progressive Insurance Company (hereinafter "Progressive") denied a similar claim made by Siiothan Andrew Connor relating to the same alleged accident on the basis that the insured's Progressive automobile policy's coverage cancelled automatically on the effective date of the GEICO policy.

3. The Progressive Insurance Company received a property loss claim for approximately \$5,691.21 against the automobile policy of its insured, Rod Williams, SSN 254-41-3792, relating to vandalism of the insured's automobile that allegedly occurred on or about April 15, 1998, at or near Morgan Lake, Georgia. Progressive closed the claim without payment as a result of the insured's repeated failure to complete and return an Affidavit of Vandalism.

4. USAA Casualty Insurance Company (hereinafter "USAA") paid out approximately \$23,159.14 in medical coverage and property damage claims before denying all additional claims against the automobile policy of its insured, defendant ELIZABETH HOUSE JANES, relating to an automobile accident that allegedly occurred on or about June 13, 1998, at or near Asheville, North Carolina, in which the insured's passenger, Kenneth G. Williams, SSN 254-27-24XX, claimed to have suffered personal injuries.

\_\_\_\_5. RODNEY HANK WILLIAMS was assigned social security number 254-19-6402 by the Commissioner of Social Security.

**Purpose of the Scheme to Defraud**

6. From in or about July 1997 to in or about March 2000, in the Eastern District of Virginia and elsewhere, defendant RODNEY HANK WILLIAMS, a/k/a Simon Andrew Conrad, a/k/a Siothan Andrew Connor, a/k/a Rod Williams, a/k/a Kenneth Gary Williams, aided and abetted by defendant ELIZABETH HOUSE JANES, devised and intended to devise a scheme and artifice to defraud and to obtain moneys owned by and under the custody and control of certain insurance companies by means of material false and fraudulent pretenses, representations and promises, which scheme and artifice, and the execution thereof, operated in substance as follows:

**The Scheme and Artifice**

7. It was a part of the scheme and artifice to defraud that defendant RODNEY HANK WILLIAMS, aided and abetted by defendant ELIZABETH HOUSE JANES, submitted automobile insurance claims for property damage and/or personal injuries relating to three automobile accidents and one act of automobile vandalism that allegedly occurred between the dates of September 27, 1997 and June 13, 1998.

8. It was further a part of the scheme and artifice that defendant RODNEY HANK WILLIAMS, aided and abetted by defendant ELIZABETH HOUSE JANES, submitted these four automobile insurance claims to four different insurance companies.

9. It was further a part of the scheme and artifice that defendant RODNEY HANK WILLIAMS aided and abetted by defendant ELIZABETH HOUSE JANES, used a different name, date of birth, social security number, and home address on each of the four separate insurance claims he filed with the various insurance companies.

10. It was further a part of the scheme and artifice that in the three alleged automobile accidents for which he submitted insurance claims, defendant RODNEY HANK WILLIAMS, aided and abetted by defendant ELIZABETH HOUSE JANES, claimed that his car (or the car he was in) had been struck by an unknown vehicle and thereafter struck a guardrail or tree, and that the unknown vehicle thereafter left the scene of the accident.

11. It was further a part of the scheme and artifice that defendant RODNEY HANK WILLIAMS, aided and abetted by defendant ELIZABETH HOUSE JANES, claimed that he had suffered an injury to his eye, in addition to other personal injuries, as a result of each of the three alleged accidents.

12. It was further a part of the scheme and artifice that defendant RODNEY HANK WILLIAMS submitted identical 1996 U.S. Individual Income Tax Return Forms 1040 to two different insurance companies, one in the name and social security number of Simon Andrew Conrad submitted to State Farm, the other in the name and social security number of Siiothan Andrew Connor submitted to GEICO, in support of the insurance claims he had made to the companies using those aliases.

13. It was further a part of the scheme and artifice that defendant RODNEY HANK WILLIAMS signed correspondence as "R.H. Williams", "Director of Flight Operations" for BSP, Inc., the alleged employer of Simon Andrew Conrad in support of his insurance claim against State Farm.

14. It was further a part of the scheme and artifice that defendant RODNEY HANK WILLIAMS used the occupation of a pilot for three of his aliases when making his insurance claims against State Farm, GEICO, and Progressive. Moreover, defendant RODNEY HANK WILLIAMS used the name Neo Sigma as the employer for both Siathan Andrew Connor and Rod Williams in the respective claims using those aliases.

15. It was further a part of the scheme and artifice that defendant RODNEY HANK WILLIAMS used his aliases to purchase, insure and sell the vehicles used in his scheme to defraud insurance companies. Siathan Andrew Connor purchased a 1985 Chevrolet Corvette from Johnson Motor Company and R. Williams' name and signature appear on the title and bill of sale for that car. Both Siathan Andrew Connor and Rod Williams insured the identical Chevrolet Corvette under their respective automobile insurance policies with GEICO and Progressive. Similarly, on December 16, 1997, Rod Williams sold a 1990 Toyota truck to Johnson Motor Company and on the same day, Johnson Motor Company sold the identical Toyota truck to Siathan Andrew Connor. On February 7, 1998, Siathan Andrew Connor was allegedly injured in an automobile

accident while driving the same Toyota truck which was insured under that alias with GEICO.

16. It was further a part of the scheme and artifice that on or about June 1, 1998, defendant ELIZABETH HOUSE JANES purchased a 1991 Ford Taurus Station Wagon which had an odometer reading in excess of 100,000 miles.

17. It was further a part of the scheme and artifice that on or about June 2, 1998, defendant ELIZABETH HOUSE JANES added the 1991 Ford Taurus to her existing automobile insurance policy with USAA. Thereafter, on June 3, 1998, defendant ELIZABETH HOUSE JANES increased certain coverages on her USAA automobile policy as follows: increased coverage for bodily injury from \$100,000 for each person and \$200,000 for each accident, to \$500,000 for each person and \$500,000 for each accident; increased coverage for medical payments from \$5,000 for each person to \$50,000 for each person; and increased coverage for bodily injury caused by uninsured motorists from \$100,000 for each person and \$200,000 for each accident, to \$500,000 for each person and \$500,000 for each accident.

18. It was further a part of the scheme and artifice that defendants RODNEY HANK WILLIAMS and ELIZABETH HOUSE JANES drove two cars, including the 1991 Ford Taurus, to Asheville, North Carolina, and on the evening of June 13, 1998, advised police and emergency medical personnel that they had been involved in an accident in the Ford Taurus, and further advised that defendant RODNEY HANK

WILLIAMS had been injured and gave his name as "Kenneth Williams."

19. It was further a part of the scheme and artifice that on or about June 16, 1998, defendant ELIZABETH HOUSE JANES told a USAA claims adjuster during a telephone call that Kenneth Williams was a passenger in her car who was injured in a car accident near Asheville, North Carolina on June 13, 1998, thereby allowing defendant RODNEY HANK WILLIAMS to make a personal injury claim against ELIZABETH HOUSE JANES' USAA automobile policy using the name of his brother, Kenneth Gary Williams, as an alias.

20. It was further a part of the scheme and artifice that on or about August 16, 1999, defendant RODNEY HANK WILLIAMS authorized an attorney to mail a written settlement demand of \$500,000.00 to USAA to settle the personal injury claim he had made using the name of his brother, Kenneth Gary Williams.

21. It was further a part of the scheme and artifice that on or about January 20, 2000, defendant RODNEY HANK WILLIAMS appeared and testified at an examination under oath as Kenneth Gary Williams, in support of his insurance claim against USAA made under that alias.

22. It was further a part of the scheme and artifice to defraud that between on or about July 8, 1998 and on or about December 23, 1998, defendant ELIZABETH HOUSE JANES endorsed two USAA checks made payable to herself and co-endorsed five USAA checks made payable to "Kenneth G. Williams" also endorsed by a signature appearing to be that of Kenneth G. Williams, said seven

checks thereafter all being deposited into the same bank account.

**Wire Transmissions in Furtherance of the Scheme**

On or about June 16, 1998, at or near Norfolk, Virginia, within the Eastern District of Virginia and elsewhere, defendant ELIZABETH HOUSE JANES, aided and abetted by defendant RODNEY HANK WILLIAMS, for the purpose of executing the above-described scheme and artifice to defraud and attempting so to do, knowingly transmitted and caused to be transmitted certain sounds and signals by means of wire communication in interstate and foreign commerce, that is, a telephone call from a USAA claims adjustor in Norfolk, Virginia to defendant ELIZABETH HOUSE JANES in or near Thompson, Georgia, in which defendant ELIZABETH HOUSE JANES knowingly falsely claimed Kenneth Williams as the injured passenger in her vehicle on June 13, 1998.

(In violation of Title 18, United States Code, Sections 1343 .)

**COUNTS TWO THROUGH ELEVEN**

1. The United States realleges and reasserts paragraphs 1 through 22 of Count One as if fully set forth herein.

2. On or about the date listed below for each Count, at or near Norfolk, Virginia, within the Eastern District of Virginia and elsewhere, defendant RODNEY HANK WILLIAMS, also known as Kenneth Gary Williams, aided and abetted by defendant ELIZABETH HOUSE JANES, for the purpose of executing the above-described scheme and artifice to defraud, knowingly transmitted and caused to be transmitted certain sounds and signals by means of wire



communication in interstate and foreign commerce, that is, a facsimile transmission from at or near Thompson, Georgia to USAA in Norfolk, Virginia:

COUNT	APPROXIMATE DATE	FACSIMILE TRANSMISSION
2	07/09/98	Application for Medical Payments Benefits and Application for Extended Medical, Death and Disability Benefits signed Kenneth G. Williams
3	07/20/98	Letter signed Kenneth Williams containing bill for ambulance service and requesting payment for expenses and lost wages
4	07/24/98	Letter signed Kenneth Williams complaining of USAA's handling of his claim and threatening a lawsuit
5	08/07/98	Letter signed Kenneth Williams complaining of USAA's handling of his claim and threatening complaint to insurance commissioner
6	08/20/98	Letter signed Kenneth Williams containing settlement statements and W-2 forms from his employers
7	08/24/98	Letter signed Kenneth Williams containing medical bill for reimbursement
8	08/28/98	Letter signed Kenneth Williams complaining of USAA handling of claim and threatening legal action
9	09/08/98	Letter signed Kenneth Williams containing medical bills, itemized expenses and lost wages due to accident for reimbursement
10	10/12/98	Letter signed Kenneth Williams containing medical bills and complaining of lack of reimbursement, threatening legal action
11	10/19/98	Letter signed Kenneth Williams containing medical bills and denial letter from USAA

(All in violation of Title 18, United States Code, Sections 1343.)

## **COUNT TWELVE**

1. The United States realleges and reasserts paragraphs 1 through 22 of Count One as if fully set forth herein.

2. On or about August 16, 1999, at or near Norfolk, Virginia, within the Eastern District of Virginia and elsewhere, defendant RODNEY HANK WILLIAMS, aided and abetted by defendant ELIZABETH HOUSE JANES, for the purpose of executing the above-described scheme and artifice to defraud and attempting so to do, knowingly transmitted and caused to be transmitted certain sounds and signals by means of wire communication in interstate and foreign commerce, that is, a facsimile transmission from an attorney at or near Franklin, Tennessee to USAA in Norfolk, Virginia, in which the attorney makes a settlement demand of \$500,000 on behalf of defendant RODNEY HANK WILLIAMS to settle his case against the insurance company.

(In violation of Title 18, United States Code, Sections 1343.)

### **COUNT THIRTEEN**

On or about June 16, 1998, at or near Norfolk, Virginia, in the Eastern District of Virginia and elsewhere, defendant ELIZABETH HOUSE JANES, aided and abetted by defendant RODNEY HANK WILLIAMS, knowingly transferred and used, without lawful authority, a means of identification of another person, to wit: the name Kenneth Williams, with the intent to commit, and to aid and abet, any unlawful activity that constitutes a violation of Federal law, and that constitutes a felony under any applicable State or local law.

(In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.)

### **COUNT FOURTEEN**

On or about July 9, 1998, at or near Norfolk, Virginia, in the Eastern District of Virginia and elsewhere, defendant RODNEY HANK WILLIAMS, aided and abetted by defendant ELIZABETH HOUSE JANES, knowingly transferred and used, without lawful authority, a means of identification of another person, to wit: the name Kenneth G. Williams, SSN 254-27-24XX, and date of birth 11-10-1969, with the intent to commit, and to aid and abet, any unlawful activity that constitutes a violation of Federal law, and that constitutes a felony under any applicable State or local law.

(In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.)

**COUNT FIFTEEN**

THE GRAND JURY FURTHER CHARGES THAT:

1. RODNEY HANK WILLIAMS was assigned social security number 254-19-6402 by the Commissioner of Social Security.

2. On or about July 9, 1998, in the Eastern District of Virginia, the defendant RODNEY HANK WILLIAMS, aided and abetted by defendant ELIZABETH HOUSE JANES, for the purpose of obtaining a payment from USAA to which he was not entitled, did knowingly and with intent to deceive, falsely represent number 254-27-24XX to be the social security number assigned to him by the Commissioner of Social Security, when in fact RODNEY HANK WILLIAMS then well knew such number was not his social security number.

(In violation of Title 42, United States Code, Section 408(a) (7) (B) and Title 18, United States Code, Section 2.)

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

PAUL J. McNULTY  
UNITED STATES ATTORNEY

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